

MORTON & CRAIG LLC
110 Marter Ave.
Suite 301
Moorestown, NJ 08057
Telephone: 856-866-0100
Attorney for: Santander Consumer USA Inc.
JM-5630_____

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)
Case No. 18-17695 (CMG)
SAMUEL K. TOMPOE)
Chapter 13
CECELIA TOMPOE)
OBJECTION TO CONFIRMATION

Santander Consumer USA Inc. ("Santander"), a secured
creditor of the Debtors, objects to the Debtor's plan for
the following reasons:

- a. The debtor's proposed plan fails to pay Santander interest
on its claim. The previous plan confirmed on March 5, 2021
paid Santander an interest rate of 5%. The debtor is bound
by the terms of the previously confirmed plan.
- b. Santander reserves the right to object to the feasibility
and good faith of this plan and filing.

/s/John R. Morton, Jr.

Date: 11-11-2022
John R. Morton, JR., attorney for
Santander Consumer USA Inc.